



New York State
Office of
Children &
Family
Services

August 12, 2008

Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Draft Eligible Services List for Schools and Libraries
Universal Service Mechanism, FCC 089-180
CC Docket No. 02-6

Dear Sir/Madam:

David Paterson
Governor

Gladys Carrión, Esq.
Commissioner

Capital View Office Park

52 Washington Street
Rensselaer, NY
12144-2796

By this letter, the New York State Office of Children and Family Services (OCFS) respectfully submits its comments on the Federal Communications Commission (FCC or Commission) Notice seeking comment on the Universal Service Access Corporation's (USAC's) draft eligible services list for schools and libraries for Funding Year 2009 (FY2009).

The draft eligible services list for FY2009 includes, among other proposals: a "clarification" that Ethernet is an eligible digital transmission technology; a "clarification" that email archiving is an ineligible component of an eligible service; and a proposal to list intranet web hosting as an ineligible feature of an eligible web hosting service.

OCFS supports the FCC's clarification of Ethernet's status. However, OCFS respectfully opposes the FCC's determinations of ineligibility concerning email archiving and intranet web hosting. We believe that email archiving can play an important role in safeguarding children, and that use of an intranet site can be valuable to instructors in their essential job functions. Furthermore, OCFS believes that the FCC should expand its eligible services list to allow educators the fullest responsible use of advanced technology in their mission of educating children, as we will discuss in our comments on the FCC's notice of rulemaking on eligible services, released July 31, 2008.

Thank you for this opportunity to submit comments.

Very truly yours,



/s/

Dee Alexander
Federal Legislative Liaison

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